

Otho A. Toms  
and Herman S. Toms  
On Petition

No. 17992 Equity  
In the Circuit Court  
for Frederick County,  
Maryland

To The Honorable, The Judges of said Court.

The answer of H. Clyde Toms to the petition filed in the above-entitled case on February 18, 1955, respectfully shows:

1. He admits the allegations of the first paragraph of said petition.

2. He admits the allegations of the second paragraph of said petition.

3. Answering the third paragraph of said petition, this respondent says that he has no knowledge of the allegations therein contained, and is, therefore, unable to answer the same.

4. Answering the fourth paragraph of said petition, this respondent says that he desires to have a survey made of the property which he purchased from Sheridan Toms on September 15, 1954, at public sale, as he believes the area of parcel No. 1 is twenty-five (25) acres, more or less, instead of thirty-five (35) acres and sixty-three (63) square perches, more or less, as stated in the deed dated September 2, 1913, from Arthur D. Willard, Trustee, to Sheridan Toms and Olevia C. Toms, his wife, and recorded in Liber H. W. B. 306, folio 251, one of the land records of Frederick County, Maryland.

5. Answering the fifth paragraph of said petition, this respondent denies that he has exercised certain dominion over the property which he purchased at said public sale, and further says that he is willing to settle for said real estate on March 19, 1955.

6. Answering the sixth paragraph of said petition, this respondent says that he has no knowledge of the allegations therein contained, and is, therefore, unable to answer the same.

And as in duty bound etc.

Walter E. Sinn  
Solicitor for H. Clyde  
Toms, respondent

H. Clyde Toms  
(H. Clyde Toms) Respondent